

Sherri A. Jayson
Manhattan Office
sjayson@gvlaw.com
646.998.1958

March 24, 2025

BY ECF Only

Hon. Barbara Moses
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Nunez v. Steve Livestock Hauling LLC et al.
Case No.: 1:23-cv-01332

Your Honor:

Application GRANTED. The status conference originally scheduled for April 1, 2025 is hereby ADJOURNED to **June 10, 2025 at 11:00 a.m.** The parties must submit a joint status letter no later than **June 3, 2025** (see Dkt. 29 ¶ 8.) SO ORDERED.



Barbara Moses
United States Magistrate Judge
March 26, 2025

The parties submit this joint status report pursuant to your Order dated February 10, 2025 (ECF Doc. No. 23).

We completed party depositions today. The parties will serve post-deposition demands by March 31, 2025.

In addition, as per the letter motion dated February 12, 2025, Plaintiff Ana attended an IME with a spinal surgeon on March 7, 2025. The IME with the orthopedic surgeon is scheduled for and April 8, 2025. The IMEs of Plaintiff Espinal is scheduled for April 15. Based on these examination dates, I anticipate being able to serve our expert witness disclosures in accord with Rule 26 by May 26, 2025 and that rebuttal reports can be served by June 16, 2025 as per your February 10, 2025 Order.

At this point in time, the parties do not we intend to conduct expert depositions, but reserve their right to make that determination following receipt of the expert disclosures.

As there are no issues in dispute and the parties remain in frequent contact, we respectfully request that the April 1, 2025 conference be adjourned to early June 2025 after the parties' have had an opportunity to review the expert disclosures and at which point we will have a more realistic view of our positions as to the completion of expert discovery and settlement. In the interim, we will begin our settlement discussions and whether we will lean towards a settlement conference and/or mediation in order to try to resolve the case. In addition, I will be out of the country from May 20 to May 31, 2025.

Hon. Barbara Moses

March 24, 2025

Page 2

Respectfully submitted,


Sherri A. Jayson

cc: Michael Mahan, Esq. (By ECF Only)
Michael Ross, Esq. (By ECF Only)